

**Small Parties Group ESI Status Report**  
**November 16, 2020**

Party Name	Status Narrative, Including Challenges
Ashland LLC	ESI production is ongoing. QC review of ESI for production. Negotiation of search terms and responsiveness issues. Estimated date of completion: 12/31/2020. No productions made to date.
BASF Corporation (on its own behalf and on behalf of BASF Catalysts LLC)	Collection of ESI has been completed. We are currently reviewing for relevance and privilege. We need to complete relevance and privilege review of what is a large collection of documents. We expect to complete the review make our production sometime in December. No productions have been made to date.
Benjamin Moore & Co.	Review is ongoing. Internal collection and review complete. Estimated date of completion - 11/30/2020. Have produced approximately 50,000 pages so far.
Berol Corporation	Collected ESI will be substantially produced before 11/18 SM conference. Left to complete: Collection and review of ESI from one additional custodian, which has been delayed due to COVID19-related collection challenges. If additional responsive ESI is found to exist, it will be produced. Estimated date of completion: 12/18/2020. Will produce 3 documents on 11/16 or 11/17/2020.
Canning Gumm, LLC	Ongoing. ESI searches have been conducted and documents are being reviewed for responsiveness and privilege. Estimated date of completion: 12/1/2020. No production volume to date. Based on our review, ESI is limited.
CNA Holdings LLC (by and through its indemnitor Essex County Improvement Authority)	On October 1, 2020, in accordance with counsels' previously agreed upon approach, CNA Holdings, LLC ("CNA") produced to plaintiff's counsel 34,066 pages of ESI. Additionally, CNA further produced 8,014 pages of paper documents in electronic format. CNA has not identified any further ESI for production. (VOL005B – CNAH-FED-0000077236 to CNAH-FED-0000111301 – ESI - (1,236 docs / 34,066 pages / 6 Power point Natives) – 10/1/2020). CNA now is preparing a privilege log for production to plaintiff's counsel. Estimated date of completion: 1/29/2021. All document productions of CNA Holdings, LLC to date: VOL001 - CNAH-FED-0000000001 through CNAH-FED-0000033507 – Paper Documents (3,208 docs / 33,507 pages) – 4/19/2019; VOL002 – CNAH-FED-0000033508 - CNAH-FED-0000039297 – Paper Documents (547 docs / 5,790 pages) – 5/3/2019; VOL003 – CNAH-FED-0000039298 - CNAH-FED-0000072514 – Paper Documents (1,313 docs / 33,217 pages / 0 Excel Native) – 6/26/2019; VOL004 – CNAH-FED-0000072515 through CNAH-FED-000007723 - Paper Documents (130 docs / 4,721 pages / 0 Excel Native) – 11/11/2019; 2/7/2020 Production - 12 standard boxes, sized 10" x 12" x 15" of paper documents, made available for OxyChem's on-site review – 2/7/2020; VOL005B – CNAH-FED-0000077236 to CNAH-FED-0000111301 – ESI - (1,236 docs / 34,066 pages / 6 PowerPoint Natives) – 10/1/2020; VOL005A - CNAH-FED-0000111302 through CNAH-FED-0000119315 – Paper Documents (373 docs / 8,014 pages / 0 Excel Native) – 10/1/2020

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Coats & Clark, Inc.	Ongoing. Need to complete privilege review and QC. In addition to hard copy documents (48647 pages), we have produced 2,087 ESI documents totaling 34,126 pages in January 2020. Estimated date of completion: 12/31/2020.
Cooper Industries, LLC	Ongoing. Review of collected materials for responsiveness and privilege. Large volumes of mostly non-responsive ESI received from client for review, a large portion of which had little or poor OCR text available. Estimated date of completion: 12/31/2020. Cooper has produced: Documents: 2,330 (5 - ESI), Pages: 50,741 (14,664 - ESI), Last Date of Production: 1/21/2020.
Covanta Essex Company	Covanta has retained an ESI search firm to search Covanta's numerous databases. Covanta has met with a 3rd party vendor and has begun the process of retrieving discoverable ESI from Covanta's document custodians. We continue to review ESI in our possession and work with the vendor on interviewing custodians and data collection. The 3rd party vendor will continue to work with Covanta and will continue to meet with records custodians. COVID-19 coordination issues, conflicting demands on client's IT personnel and identified document custodians, the 24 year passage of time since the facility went to zero discharge configuration, and the legacy ESI system challenges including but not limited to the 2005 acquisition of American Ref-Fuel by Covanta. Covanta believes that it has little, if any, ESI responsive to the RFP's. Estimated date of completion: 12/31/2020.
DII Industries, LLC	All ESI collected and substantially reviewed, but final review remains ongoing. Estimated date of completion: 12/18/2020.
Emerald Kalama Chemical, LLC	Complete. ESI (EKC-FED-000001 through EKC-FED-000363) provided on 9/10/20 (a refreshed link was provided to plaintiff's counsel on 10/5/20).

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Franklin-Burlington Plastics, Inc.	The status of our ESI production is ongoing. Franklin-Burlington Plastics, Inc. (FBP) has collected and is continuing to collect potentially responsive ESI from the custodians and sources identified in its April 24, 2020 correspondence to OxyChem, among others. FBP is in the process of reviewing the ESI collected for responsiveness and privilege issues. FBP anticipates providing additional documents as part of its rolling productions of ESI in the near future. FBP's counsel's firm is currently implementing a work from home policy to mitigate the effects of the Coronavirus Pandemic. The remote working environment has affected FBP's counsel's ability to coordinate effectively. In addition, FBP has experienced delays in accessing the sources of ESI it has identified because of stay-at-home orders and remote working policies implemented in response to the Coronavirus Pandemic. Further, due to a divestiture of a portion of FBP's former parent company, some of the ESI related to FBP's former operations is no longer in FBP's possession, custody, or control. FBP continues to work with this third party to obtain any ESI it may have within its control related to FBP's former operations. Estimated date of completion: 12/31/2020. FBP has made available on April 19, 2019, returned by OCC on September 17, 2019 - 127,491 pages (FBPI-FED-000000001 – FBPI-FED-000127491). January 15, 2020 - 3,099 pages (FBPI-FED-000127492 – FBPI-FED-000130589). January 21, 2020 – 9,721 pages (FBPI-FED-000130590 – FBPI-FED-000140311). June 18, 2020 - 198 pages (FBPI-FED-000140312 – FBPI-FED-000140510)
General Electric Company	Ongoing. GE has collected its ESI and applied search terms. Relevance and privilege review of the ESI is currently ongoing. Estimated date of completion: 12/15/2020. GE has produced 5019 paper documents to date bearing Bates numbers GE00000086 through GE00005104 which were part of GE's production in the New Jersey Spill Act Litigation.
Givaudan Fragrances Corporation	ESI production is ongoing. Finalizing review of documents from remaining custodians after negotiation of relevant search terms. Estimated date of completion: 12/31/2020. Givaudan has produced in April 17, 2020: 2,020 documents; September 3, 2020: 2,323 documents (24,855 pages).
Goodrich Corporation (on behalf of itself and Kalama Specialty Chemicals, Inc.)	Ongoing. Produced (KALAMA-FED-0000003723 through KALAMA-FED-0000004110) 11/13/20. Additional ESI under review. Left to complete: Linear review of additional documents identified as potentially responsive through broad electronic search. Estimated date of completion: 12/31/2020.
Hexcel Corporation	All ESI collected and substantially reviewed, but final review remains ongoing. Estimated date of completion: 12/11/2020. No ESI-specific production to date (which will be forthcoming), but Hexcel has produced over 65,000 pages in discovery in this litigation and re-produced an additional 135,000 pages from the Spill Act litigation.

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Hoffmann-LaRoche Inc.	After much searching Roche has identified a universe of extant ESI of all varieties which exist in various sites and platforms. As of yet Roche has not made any determination if any of these materials are relevant or in searchable format. Thus, Roche would have to characterize the search as ongoing. Roche needs to upload and process which of the ESI before it can determine its relevance or magnitude of the documents. Roche would then run the algorithms to produce “hits”. These would then have to be reviewed for relevance, privileges, etc. As previously stated, Roche’s facility was closed in 2013 and sold in 2016 before this suit was instituted. ESI was mothballed and stored in various facilities. Most of these facilities are closed due to the pandemic. Estimated date of completion: 1/31/2021. Roche has produced 206,000 pages of environmental investigation, remediation, historical information regarding the site and correspondence with NJDEP in or about May 2019. It is believed that these documents are duplicative of many ESI files in the ESI universe. We produced these documents on computer discs. We advised OCC that these were the relevant documents in response to their Request for Documents. Roche stated if their review lead them to questions whether other documents existed or were incomplete then we would endeavor to ascertain if they were available. No such request has been made.
Honeywell International Inc.	
ISP Chemicals LLC	ESI production is ongoing. QC review of ESI for production. Negotiation of search terms and responsiveness issues. Estimated date of completion: 12/31/2020. No productions made to date.
L3Harris Technologies, Inc., successor in interest to Exelis Inc., successor in interest to the defense business of ITT Corporation	Ongoing. L3Harris has collected ESI from relevant custodians. The collected ESI needs to be processed for review, selection and production. COVID-19 hurdles to access, as well as collection team challenges, affected the collection stage. Estimated date of completion: 1/15/2021. No productions made to date.
Legacy Vulcan, LLC	Ongoing. Potentially relevant ESI has been collected and compiled from custodians, and the compilation has been provided to the ESI vendor for processing by the vendor. We are in the process of sorting and reviewing for production. Legacy Vulcan LLC’s offices have been closed throughout the COVID-19 pandemic. While employees are working remotely, this has slowed ESI efforts. Among other things, Legacy Vulcan’s IT staff (whose support was necessary for the potentially relevant ESI identification process) has been consumed with IT support obligations associated with supporting a remote workforce. Estimated date of completion: 12/31/2020. We estimate that we will be able to begin production in the first part of December.
McKesson Corporation	Ongoing. Need to complete second level attorney review. Estimated date of completion: 11/30/2020.
Nappwood Land Corporation	

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National-Standard LLC	Tentatively National-Standard LLC has completed its search and has no ESI discovery. We will receive final confirmation from the client representatives within the next month. Final confirmation from National-Standard needs to be received but the search has been completed and no ESI is expected. The National Emergency caused by the pandemic makes it difficult to communicate with representatives. Further, the National-Standard Facility was closed and demolished thirty years ago. This defendant was acquired by its current owners in 2000. Records dating from prior to the acquisition were likely not conveyed to the current owners. Estimated date of completion: 12/16/2020. We do not expect to have any ESI.
Newell Brands Inc. (f/k/a Newell Rubbermaid Inc.)	ESI is approximately 3/4 reviewed. A production will have been made before the 11/18/20 Special Master conference. An additional production will be made within the next week or two, which will substantially complete production of all ESI collected to date. Left to complete: QA/QC review of some potentially responsive documents; collection and review of documents from one custodian where collection has been delayed due to COVID19 related collection issues. Estimated date of completion: 12/18/2020. Will produce approx. 395 documents 11/16 or 11/17/20.
Nokia of America Corporation	Ongoing. Need to complete privilege review and redactions. Estimated date of completion: 12/30/2020. No ESI produced to date.
Noveon Hilton Davis, Inc.	Ongoing. Need to complete linear review of documents returned from the search using broad search terms. Noveon Hilton Davis has produced HD-FED-005702 through HD-FED-006268. Estimated date of completion: 12/31/2020.
Otis Elevator Company	ESI production is complete. A small amount of ESI discovered during search of ESI from United Technologies (now Raytheon Technologies), the former parent of defendant Otis Elevator, and produced (OTIS-FED-0000000088 through OTIS-FED-0000000180) to Oxy on 11/2/20.
Pabst Brewing Company, LLC	Ongoing. ESI searches have been conducted and documents are being reviewed for responsiveness and privilege. Estimated date of completion: 12/1/2020. No production volume to date. Based on our review, ESI is limited.
Pharmacia LLC	

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Pitt-Consol Chemical Company	Ongoing. Pitt-Consol's ESI work is ongoing. Pitt-Consol previously produced more than 100,000 pages of discovery in addition to its prior Spill Act production, including many site investigation and remediation reports. Pitt-Consol also previously produced in electronic format sampling data through 12/31/19 for its site and is working on updating its production with newer 2020 sampling data. Pitt-Consol negotiated ESI search terms and records custodians with OxyChem, and was able to collect some ESI from a limited number of client custodians and from the client's site remediation consultant. Since last month, the first-level review of the additional ESI was completed; second level/QA/QC work and rolling productions are ongoing. Pitt-Consol expects additional ESI productions on a bi-weekly basis through 12/31/20 when it hoped to be substantially complete. In 2019, Pitt Consol and DuPont produced 124,793 pages of documents originally produced in the 2011 Spill Act litigation. Since then in 2019 and 2020, Pitt Consol produced 133,199 pages of additional documents, including most recently approximately 3,500 pages in a production on 11/16/20.
PPG Industries, Inc.	Ongoing. PPG has collected its ESI and applied search terms. Relevance and privilege review of the ESI is currently ongoing. Estimated date of completion: 12/15/2020. PPG has produced 1,638 documents containing 224,906 pages to date.
Public Service Electric & Gas Company (PSE&G)	First level review complete. Privilege review ongoing. Privilege review and pre-production processing are ongoing. We expect to complete the rolling production of PSE&G's ESI by December 31, 2020, with the exception of the production of digitized legacy media and supplemental ESI.
Purdue Pharma Technologies, Inc.	Ongoing. Need to complete privilege review and redactions. Estimated date of completion: 12/30/2020. No ESI produced to date.
Quala Systems, Inc.	Ongoing. Data collection and validation is complete. Data processing and review for responsiveness and privilege are now ongoing. A production is anticipated to be made by December 31, 2020.
Quality Carriers, Inc.	Ongoing. Data collection and validation is complete. Data processing and review for responsiveness and privilege are now ongoing. A production is anticipated to be made by December 31, 2020.
RTC Properties, Inc.	Ongoing. Counsel is reviewing documents that were returned based on the agreed-upon search terms. A large volume of non-responsive and non-relevant documents were returned, which has slowed the completion of this process. Estimated date of completion: 12/18/2020.
Stanley Black & Decker, Inc.	ESI is complete as of 9/15/2020. Stanley Black & Decker has produced: 4/15/19 - 55 documents, 14,216 pages; 6/24/20 - 341 documents, 15,229 pages; 9/15/20 - 507 documents, 6,225 pages.



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Sun Chemical Corporation	ESI production is complete. Privilege log will be produced within 120 days pursuant to the ESI protocol. Estimated date of completion - 11/2/2020. Have produced: SUNC-FED-000000001 to SUNC-FED-00000007853 produced on April 18, 2019; and SUNC-FED-00000007853 through SUNC-FED-0000026257 produced on November 2, 2020.
Textron Inc.	
The Hartz Consumer Group, Inc. for the Hartz Mountain Corporation	
The Newark Group, Inc.	Ongoing. The Newark Group, Inc. continues to review ESI for privilege and responsiveness purposes and anticipates making at least one additional production before the December 31, 2020 deadline. The Newark Group, Inc. produced 23 documents/2,535 pages on September 30, 2020.
The Okonite Company, Inc.	Ongoing. Okonite will be producing approximately 5300 documents, identified through ESI searches, this week. Additional old equipment has been identified, and is being prepared for document extraction and review regarding relevance. It is anticipate that any relevant information will be duplicative of what has already been produced. Challenges include building closure and restrictions, limiting access to actual hard drives. Likewise, the equipment requires extraction and conversion to searchable format, which has been limited by COVID issues, such as access, and ability to submit to vendors. Estimated date of completion: 12/31/2020.
The Sherwin-Williams Company	Review is ongoing. Email review underway. Estimated date of completion: 12/23/2020. Produced to date - 48,048 documents.
TPL Management Operations, a series of Evergreen Resources Group, LLC on behalf of itself and Sunoco (R&M), LLC and Sunoco Partners Marketing & Terminals L.P.	The production of ESI is still ongoing. The Sunoco Parties have reviewed responsive documents based upon targeted search terms. A second-level review for potentially privileged and responsive documents is currently underway. Estimated date of completion: 12/31/2020.

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ViacomCBS Inc. (f/k/a CBS Corporation)	<p>ESI review and production is ongoing. ViacomCBS Inc. already produced some of its ESI in the form of sampling data from the ongoing ISRA investigation at the former Westinghouse property that is identified in this action. Since Westinghouse ceased activities and sold the former Westinghouse property in 1983, the only ESI that ViacomCBS has is related to the ongoing ISRA investigation at the former Westinghouse property. ViacomCBS collected ESI from all relevant custodians and files. ViacomCBS searched the ESI using the SPG search term list, which Occidental previously approved. ViacomCBS did not opt to alter or modify the pre-approved SPG search term list in any way. The initial responsiveness review of the universe of potentially relevant ESI is now complete. The next step is a QA/QC review, after which point ViacomCBS will produce the remainder of its ESI, subject to any future supplementation of new files in accordance with the Federal Rules. ViacomCBS has experienced hurdles that many parties are facing due to the COVID pandemic. The ESI review process has moved slower than it would have due to the limitations of remote working. Estimated date of completion: 12/31/2020.</p>